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(Formed in the Commonwealth of Pennsylvania)

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Counsel to the Official Committee of Unsecured Creditors

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:	:	Chapter 11
	:	
HERITAGE HIGHGATE, INC., et al., ¹	:	Case No. 09-11198 (GMB)
	:	
	:	(Jointly Administered)
Debtors.	:	Hearing Date: September 29, 2009 @ 11:30 a.m.
	:	Objection Date: September 22, 2009 @ 4:00 p.m.

**NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS TO DETERMINE THE VALUE OF THE SECURED CLAIMS OF THE
CORNERSTONE INVESTORS PURSUANT TO 11 U.S.C. § 506(a) AND
RULE 3012 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

PLEASE TAKE NOTICE that on September 29, 2009 at 11:30 a.m., or as soon
thereafter as counsel may be heard, the Official Committee of Unsecured Creditors (the
“Committee”) appointed in the bankruptcy proceedings of Heritage Highgate, Inc. and Heritage-

¹ The Debtors are the following: Heritage Highgate, Inc. (EIN: 20-3450062) and Heritage-Twin Ponds II, L.P. (EIN: 20-3897626) (Case No. 09-11197), 773 Yorkshire Drive, Breinigsville, PA 18031.

Twin Ponds II, L.P. (collectively, the “Debtors”) hereby requests a determination of the value of the claims of the “Cornerstone Investors” asserted as being secured by a lien on property of the Debtors pursuant to 11 U.S.C. § 506(a) and Rule 3012 of the Federal Rules of Bankruptcy Procedure (the “Motion”).

PLEASE TAKE FURTHER NOTICE that the Committee shall rely upon the Motion filed simultaneously herewith in support of the relief sought and proposed Order. As the issues before the Court are not novel, it is submitted that no brief is necessary pursuant to L.B.R. 9013-2.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested must be made in writing and in the form prescribed by the Federal Rules of Bankruptcy Procedure and the District of New Jersey Local Bankruptcy Rules, and must be filed with this Court and served upon and received by counsel to the Committee at Fox Rothschild, LLP, 2000 Market Street, Tenth Floor, Philadelphia, PA 19103 (Attn: Joshua T. Klein, Esq.) jklein@foxrothschild.com, and Midtown Building, Suite 400 1301 Atlantic Avenue, Atlantic City, NJ 08401 (Attn: Michael J. Viscount, Jr.) mviscount@foxrothschild.com, in accordance with D.N.J. LBR 9013-1(d).

PLEASE TAKE FURTHER NOTICE that, in the event that timely objections are not filed with the Court and served upon the Committee as provided in D.N.J. LBR 9013-1(a) and (f), the Motion shall be deemed uncontested and the Court may, in its discretion, grant the requested relief.

PLEASE TAKE FURTHER NOTICE that, in accordance with D.N.J. LBR 9013-1(f), unless timely objections are filed and served upon the appropriate parties, the applicant submits to disposition on the papers.

FOX ROTHSCHILD LLP

Counsel for the Official Committee
of Unsecured Creditors

/s/ Michael J. Viscount, Jr.
Michael J. Viscount, Jr., Esquire

Dated: September 4, 2009